

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Expanding the Economic and Innovation) Docket No. 12-268
Opportunities of Spectrum)
Through Incentive Auctions)

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Comments

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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12 th Street, SW
Washington, DC 20554

RE: Comments in the Matter of Expanding the Economic and Innovation Opportunities of
Spectrum Through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

As broadcasters consider the change from today to the post-auction spectrum repacking, there is a pent up need to move broadcasters to the level they really wish to be at, that is, protected full-power status. I have had the chance to think of solutions that hopefully make the best of a situation thrust on us all. My simple solution can benefit the entire TV industry.

1. For many years there has been a hold on applications for LPTV operators to upgrade to "Class A" status. We received our station license after 2000, so have never been able to apply for the Class-A upgrade at all! Even so, becoming a Class-A station would merely only add responsibilities without little reward for the added effort.
2. For many years there has also been a freeze on application for any FULL POWER stations. This is something I have been waiting for, since my licenses cover large geographic areas.
3. To remedy these two problems I suggest opening a specific window to allow ALL LPTV operators, including Class-A's, to have the opportunity to use their current licenses. and change their status to full power. Since our LPTV facilities already have been shown to meet all the technical requirements, and do not cause interference as an example, then granting this opportunity should not be a technical issue. This new window could be limited to only existing LPTV licensees as of Jan 1 2013, so no outside speculators would

be eligible. It would not be general open window for full power facilities. In this way those of us that already provide a local broadcast service, and could meet the requirement of a full power license, could continue such operations with protection.

4. As a broadcaster we currently are using all of our bandwidth with not one but three channels (Local Sports and entertainment, Retro Programming and Spanish programming), and thereby sharing a channel is not possible. Even if it was possible there many potential legal, financial, and technical problems which we could not afford to bare without assistance, as is provided for in the incentive auction law.

Respectfully submitted

Kenneth Lewetag